

1. BACKGROUND AND WHO WE ARE

- (a) This document sets out the policy of the Sunny Trading Group relating to the protection of the privacy of personal information (**Privacy Policy**). The Sunny Trading Group includes the following companies:
- (i) Sunny Trading Group Pty Ltd (ACN 638 453 808); .
- (b) The Sunny Trading Group has its headquarters in Melbourne, Victoria and has operations in Melbourne, Victoria. It supplies goods and services to customers in Australia and in other countries.

2. WHAT IS THIS PRIVACY POLICY ABOUT?

- (a) We respect the privacy of your personal information in our care and are committed to protecting the privacy of the personal information we collect and receive.
- (b) The purpose of this Privacy Policy is to explain:
- (i) the application of this Privacy Policy
- (ii) the kind of information we collect about you, how we collect it, and how we use it;
- (iii) how we may disclose that information;
- (iv) how you can access the information we hold about you;
- (v) when we may use your information to contact you;
- (vi) the protection of your personal information;
- (vii) our use of cookies and other online marketing tools to collect information, and how you can control or delete these cookies.
- (c) This Privacy Policy also informs you of your rights to privacy and describes how we comply with our privacy requirements as set out in the *Privacy Act 1988* (Cth) (**Privacy Act**), the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth) and the *Privacy (Credit Reporting) Code 2014* (**Privacy Code**). The Australian Privacy Principles contained in the Privacy Act govern the way in which we collect, use, disclose, store, secure and dispose of your personal information.
- (d) This Privacy Policy also deals with how we collect, manage, store and disclose your "personal information". Certain parts of this Privacy Policy also apply to "credit related information" and "sensitive information". These terms are discussed below.

3. YOUR CONSENT

- (a) By purchasing goods and/or services from Sunny Trading Group you consent to the privacy practices set out in this Privacy Policy. In particular, you consent to us collecting, storing, using and disclosing sensitive information and credit related personal information about you as set out in this Privacy Policy.
- (b) You have the option of remaining anonymous or use a pseudonym in your dealings with us. However, in most situations we will be unable to provide you with a good or service if you do not provide us with your personal information. We need to have your details in order to supply our goods and services to you, at your address. We are also unable to provide you with credit if you do not supply us with all the information we request from you.
- (c) If you have concerns about your rights to anonymity or the use of a pseudonym, you can contact our Privacy Officer on a no-names and confidential basis.
- (d) Similarly, if you do not agree with the Privacy Policy and do not give the above consent, please contact our Privacy Officer us to discuss your options.

4. WHAT IS PERSONAL INFORMATION, SENSITIVE INFORMATION AND CREDIT RELATED INFORMATION?

- (a) The term "personal information" is defined by the Privacy Act. Personal information is information or an opinion that can be used to identify you or which allows your identity to be worked out from the information. This might include personal details like your name, address, date of birth, other contact information like your email address and phone number and financial information like your credit card number or bank details. It may also include your opinions about our goods and services and our staff, as well as any information send to us through correspondence.
- (b) "Sensitive information" is a type of personal information. Sensitive information can include information like your racial or ethnic origin, health information, political opinions, membership of a political association, professional or trade association or trade union and criminal record. We are required by the Privacy Act to ask for your consent to collect sensitive information.
- (c) Sometimes, the personal information we collect from you will constitute credit related personal information. "Credit related personal information" is defined by the Privacy Code. Credit related personal information can include information about your identity, repayment history information, whether you have overdue payments, whether you have ever been the subject of credit related court proceedings or insolvency proceedings and whether, in the opinion of a credit provider, you have committed a serious credit infringement.
- (d) This Privacy Policy applies to personal information, sensitive information and credit related information collected by us, whether we have asked for the information or not.

5. THE KIND OF PERSONAL INFORMATION WE COLLECT AND HOLD

- (a) The personal information and credit related information we collect and hold will depend on our dealings with you.
- (b) The different kinds of personal information we collect and hold about individuals includes:
- (i) names;
- (ii) contact details, including address, phone number and email address;
- (iii) opinions about our services, products and staff; and
- (iv) any information sent to us through correspondence.
- (c) The different kinds of credit related personal information we collect and hold (including if you submit a Credit Account Application to us) include:
- (i) the personal information listed above;
- (ii) applications for commercial credit, the type and amount of that credit and the fact that we have accessed consumer credit information to assess a credit application;
- (iii) that we and other credit providers have provided credit to an individual, payments owed to us in connection with credit provided to an individual;
- (iv) whether in our opinion, or the opinion of another credit provider, an individual has committed a serious credit infringement;
- (v) information about court proceedings, personal insolvency information and other credit related publicly available information;
- (vi) whether an individual has entered into an arrangement with us or another credit provider in connection with credit provided to the individual;
- (vii) scores, ratings, summaries, evaluations and other information relating to an individual's credit worthiness; and
- (viii) certain administrative information relating to credit, such as account and customer numbers.

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- (d) We typically collect and hold the following kinds of personal information about contractors, service providers, suppliers and job applicants:
- (i) name and contact details;
 - (ii) information contained in resumes;
 - (iii) educational details, academic and other transcripts, employment history, skills and background checks;
 - (iv) references from past employers and referees;
 - (v) information collected during the interview or assessment process;
 - (vi) details of your performance under any contract;
 - (vii) personal information required to make payments, such as bank account details; and
 - (viii) insurance policies held.
- (e) The only personal information which we collect about you when you use our website or contact us online is what you tell us about yourself, such as when you complete an online form, when you accept an invitation sent from us, including through our marketing campaigns, or information you provide to us when you send us an email. The kinds of personal information that we may collect through our website include:
- (i) your name;
 - (ii) your contact details;
 - (iii) other information you provide to us; and
 - (iv) your feedback and opinions.
- (f) For ease of understanding and reading this Privacy Policy, we will refer to personal information and credit related personal information together as "personal information".
- 6. SENSITIVE INFORMATION**
- (a) Generally, we do not collect sensitive information. If we think any sensitive information is reasonably necessary to allow us to perform our functions or activities we will ask for your consent to collect this information.
- (b) We will also collect sensitive information if the Australian Privacy Principles allow us to do so in the manner permitted to do so.
- (c) If you apply for employment with us, we may collect sensitive information from you in connection with your application, or your employment with us. This sensitive information is required by us to assess whether you have any medical conditions that might impact on your ability to safely perform the role you have applied for. By providing us with this information you consent to us using that information for the purpose of assessing your employment application and, if you are employed, for purposes in connection with your ongoing employment with us.
- 7. WHY WE COLLECT PERSONAL INFORMATION**
- We collect personal information for a number of reasons including:
- (a) to communicate with you;
 - (b) managing and administering your or your organisation's business relationship with us, including processing payments, accounting, auditing, billing and collection, support services to deliver goods or services to you;
 - (c) for marketing purposes;
 - (d) to assess a Credit Account Application submitted by you;
 - (e) to measure our performance and to improve our services;
 - (f) to generate revenue;
 - (g) for analysis of usage of our goods and services;
 - (h) to develop new goods and services;
 - (i) to assess your creditworthiness;
 - (j) to decide whether to withdraw credit facilities;
 - (k) to notify other credit providers of a default by you;
 - (l) to exchange information with other credit providers as to the status of your credit account, if you are in default with other credit providers;
 - (m) to better understand your requirements and preferences and improve our products and services;
 - (n) for insurance purposes;
 - (o) to recruit employees and engage contractors and subcontractors;
 - (p) to perform other administrative functions, like the daily operation of your credit facility;
 - (q) to comply with legal requirements;
 - (r) to run competitions and offer giveaways;
 - (s) in connection with competitions we run from time to time;
 - (t) to perform other administrative functions; and
 - (u) for purposes directly related to any of the above.
- 8. HOW WE COLLECT PERSONAL INFORMATION**
- (a) We collect personal information in many ways, including during our business dealings with you, by selling you goods and services, from Credit Account Applications you submit to us, by meeting with you, by interviewing you, by correspondence, telephone, facsimile, email, via our website, from your website, when you provide feedback, when you apply for or engage in employment with us, enter a competition operated by us, from media and publications, from other publicly available sources, from cookies and from third parties.
- (b) In most cases, we will collect information directly from you. However, in certain circumstances we will also collect personal information from third parties, including the following:
- (i) our customers;
 - (ii) government agencies;
 - (iii) law enforcement bodies;
 - (iv) publicly available records;
 - (v) public registries;
 - (vi) court or tribunal records;
 - (vii) ratings agencies;
 - (viii) search agencies;
 - (ix) regulatory and licensing bodies;
 - (x) service providers;
 - (xi) parties to whom you refer us, including previous employers and referees;
 - (xii) recruitment agencies;
 - (xiii) online searches; and
 - (xiv) social media (such as LinkedIn and Facebook).
- (c) If we are provided with information by a third party we will take reasonable steps to notify you that the information was provided to us by a third party.
- (d) We will also collect personal information from third parties if we are required or authorised by an Australian law or court/tribunal order to do so.
- (e) If you have applied for credit with us, we will collect and share credit related personal information from credit reporting bodies and other credit providers. We will only do this with your consent, which you give when you submit a Credit Account Application to us. We share credit related personal information with various commercial credit reporting agencies. More information in this regard can be obtained from our Privacy Officer.
- (f) We may also share credit related personal information with debtor insurance providers, if we take out debtor insurance. Our debtor insurance provider may collect credit related

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- personal information from credit reporting bodies and other credit providers and share this with us.
- (g) We also share credit related personal information with our legal advisers if we need to take debt recovery action.
- (h) If you are considering sending us any personal information electronically, be aware that the information may be insecure in transit, particularly where no encryption is used (e.g. email, standard http). We cannot guarantee that any information sent or accessed electronically is secure.
- (i) If you supply us with the personal information of a third party we accept that information on the condition that you have all the rights required from that third party to provide that personal information to us to use for our functions and activities.

9. HOW WE STORE PERSONAL INFORMATION AND INFORMATION SECURITY

- (a) We may hold your personal information in physical and electronic form both at our premises and with the assistance of our service providers. We implement a range of measures to protect the security of that information. In particular, your personal information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.
- (b) We store electronic personal information on our computer systems and computer servers. Most of our systems and servers are used and hosted by third party providers and are located in secure data centres that are managed by third parties, including Telstra. Some systems and servers are cloud hosted.
- (c) We prefer to use hosting companies that have servers physically located in Australia. However, we cannot guarantee that your personal information will always reside on servers that are physically located in Australia. Your personal information may be stored on servers located overseas, including in the United States of America. We also may use service providers and contractors located overseas, and your personal information may be disclosed to them.
- (d) We will take reasonable steps to ensure that any overseas recipient complies with the Privacy Act, where we are aware that they are located overseas. Where your personal information is stored or hosted overseas, access to and use of that personal information will be governed by laws that apply in those overseas locations.
- (e) We require our external service providers with access to personal information to sign data processing agreements that require them to take necessary and reasonable steps to protect the personal information provided to them.
- (f) Only our authorised personnel have access to our server and computer systems and our hard copy files. All of our server and computer systems are protected by password.
- (g) We also hold personal information in hard copy. Hard copies are stored in our offices located around Australia. We also store hardcopy files with offsite storage providers whose premises and access is strictly controlled.
- (h) All of our employees who might come into contact with personal information are educated about the terms of our Privacy Policy.
- (i) In the unlikely event of a suspected data breach, we will within 30 days assess and evaluate whether a breach has in fact occurred and will, if required, notify the relevant data protection authority unless the breach is not likely to present any risk to your rights.

10. HOW WE DISCLOSE PERSONAL INFORMATION

- (a) We disclose your personal information to third parties for the following purposes:
- (i) to provide the products or services you wish to use;

- (ii) to customise and promote our services which might be of interest to you;
- (iii) to assist us to run competitions and offer giveaways;
- (iv) to provide support to you in connection with your use of the products;
- (v) if permitted or required by law; or
- (vi) for any other purpose, with your consent.
- (b) As part of providing goods or services to you, we will sometimes need to disclose your personal information to third parties who perform part of our services. This includes third party contractors, who we contract with to provide services to you.
- (c) We may also provide your personal information to our related bodies corporate and our service providers who assist us with customer contact, archiving, auditing, accounting, legal, business consulting, IT support, banking, delivery, data processing, website or technology services. We will take reasonable and practicable steps to ensure third parties we deal with take steps to protect your privacy. All of our employees are required to maintain the confidentiality of any personal information held by us.
- (d) In some circumstances we are permitted or authorised by or under an Australian law or a court/tribunal order to use or disclose your personal and sensitive information. For example, if our disclosure of your information will reduce or prevent a serious threat to life, health or safety or our disclosure is in response to any unlawful activity.
- (e) If you apply for credit with us, we will disclose your personal information to credit reporting bodies and other credit providers.
- (f) We will take reasonable and practicable steps to ensure third parties we deal with take steps to protect your privacy. All of our employees are required to maintain the confidentiality of any personal information held by us.
- (g) We will never sell your personal information to anyone.
- (h) Generally we will not disclose your personal information to anyone overseas, except if we are required to do this by law or if it is necessary to provide you with goods and services you have ordered from us.
- (i) If you are located overseas, or you use our goods and services overseas, then your personal information may be made available to our overseas service providers and suppliers. Where these overseas entities are located outside of the European Union (EU) or the European Economic Area (EEA) we will put in place appropriate measures in accordance with our legal requirements.

11. APPLYING FOR AND EMPLOYMENT WITH US

If you submit an application or register interest for employment with us, we will collect personal information from you. If your application for employment with us is unsuccessful, we may retain this personal information to assess your suitability for another role with us. If you do not want us to retain personal information about you, please contact our Privacy Officer.

12. DESTROYING PERSONAL INFORMATION

- (a) We will generally destroy, or take steps to de-identify, personal information, when it is no longer required by us for a permitted purpose.
- (b) We otherwise destroy information after 7 years since we have last dealt with you.
- (c) We will also destroy or de-identify personal information when required to do so by law.

13. ACCESS AND CORRECTION OF PERSONAL INFORMATION

- (a) We will take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, up-to-date and complete. However, we do not promise that we will contact you to check that the personal information we

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hold about you is up to date. Generally we will rely on you to keep us informed and to ensure personal information we hold about you is up to date.

- (b) We will take reasonable steps to protect personal information that we hold from misuse, interference, loss, unauthorised access, modification or disclosure.
- (c) You have the right under the Privacy Act to request access to personal information about you that is held by us. You also have the right to request correction of any of your personal information that we hold. We will take reasonable steps to make appropriate corrections to your personal information so that it is accurate, complete and up to date.
- (d) If you would like to access, or correct, your personal information please write to our Privacy Officer using the contact details set out below. Please make sure you clearly identify the information or correction requested. In order to protect your personal information we will require identification from you before releasing the requested information.
- (e) We will use commercially reasonable endeavours to promptly provide the information requested, and within the period required under the Privacy Act.
- (f) If we are permitted to do so by law we may charge a reasonable fee to cover the cost of meeting your request.
- (g) In some cases, we may refuse to provide you with access to your personal information. We will only do this if we are permitted to do so under the Privacy Act or Privacy Code. If access is refused, we will write to you and explain why.

14. DIRECT MARKETING

- (a) We may use your personal information to send marketing materials to you if the marketing material is related to the purpose for which we collected that information.
- (b) We will ask for your consent before we use your personal information for marketing purposes if we have not collected that personal information directly from you or where sensitive information is involved.
- (c) If you receive marketing offers from us and do not wish to receive them in the future, please contact us. You can unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

15. INTERNET COOKIES, MARKETING AND ANALYTICS TOOLS

- (a) An internet cookie is a data file that is placed on the computer of an internet user during a visit to our website. Cookies are necessary to allow our website and your computer to interact effectively and to enhance security. Cookies can record information about your visit to assist us in better understanding your needs and requirements. Our website uses cookies and related technologies for a variety of purposes including to operate and personalise our website.
- (b) Cookies may also be used by us to track how you use our website, including to target adverts to you. To opt out of this you can visit opt-out websites such as www.aboutads.info, youronlinechoices.eu and networkadvertising.org/choices.
- (c) We may use third party vendor remarketing tracking cookies, including Google Adwords tracking cookies. This means we may show adverts to you across the internet, including via Google and other commercial services and networks.
- (d) Third-party vendors, including Google, may utilise cookies and web browsers in order to serve adverts to you based on visits to our website. This allows us to market our goods and services to those who have shown interest in our goods and services.
- (e) Our website may also use cookies to facilitate sampled reporting of demographics and interests of visitors to our website using Google Analytics and other similar technologies. This data is used to provide better services

and more relevant content to our users based on demographic and interest data.

- (f) If you would like to access our website but do not wish to receive any cookies, you should set your browser settings to refuse to accept cookies. This may mean that you are unable to access our website or parts of it.
- (g) You may also be able to opt out of Google's use of cookies, analytics and tracking services by visiting the Ads Preferences Manager setting in your browser and/or by visiting Google's website. You may also be able to opt out of other third-party vendor's use of cookies by visiting the opt-out website's set out above.

16. YOUR EUROPEAN PRIVACY RIGHTS

- (a) If you are a data subject in Europe under the General Data Protection Regulations 2016/679 (**GDPR**) you have the right to:
 - (i) request access to and obtain copies of the personal information we have collected from you in an easily readable format;
 - (ii) modify or rectify your personal information if it is no longer accurate;
 - (iii) exercise the "Right to be Forgotten" and request that we erase your personal information if you believe it is no longer required for the purposes for which we originally collected it; and
 - (iv) object to or restrict the collection or processing of the personal information we have collected from you
- (b) Please contact our Privacy Officer if you wish to exercise any of these rights.

17. COMPLAINTS

- (a) If you have any questions or complaints about the way we have handled your personal information you can contact our Privacy Officer using the above address or telephone contact details or by emailing us at admin@sunnytradegroup.com.au.
- (b) We take all enquiries seriously and will attend to your question or complaint promptly. Our Privacy Officer will review your complaint, consider our conduct in relation to the complaint and the requirements of the Australian Privacy Principles, and will consider appropriate action. We will respond to complaints within a reasonable period of time (usually 30 days).
- (c) If you are dissatisfied with our response to your complaint, you can make a complaint to the Office of the Australian Information Commissioner (OAIC). You can find more details about making a complaint to the OAIC here: www.oaic.gov.au/individuals/howdo-i-make-a-privacy-complaint

18. UPDATES TO THIS PRIVACY POLICY

- (a) We will review and update this Privacy Policy from time to time. If we make any changes to this Privacy Policy, we will upload a revised policy to our website.
- (b) You agree that it is your responsibility to check for updates to our Privacy Policy.

For more information about privacy issues, and to obtain copy a of the Australian Privacy Principles you can visit the OAIC website at <http://www.oaic.gov.au>.

Policy last updated March 2021.